

**BASIS OF DECISION
for NON-CLEAN UST CLOSURE**

Sanofi Corporation
5661 Branch Road, Toppenish, WA.
EPA LUST Facility #4-260003



I. **GENERAL** The subject property is about 50 acres in size with nearly half covered in pavement and buildings and the remaining property used for land application of facility process water, wastewater/treatment/storage ponds and septic fields. The facility is an industrial agricultural processing plant and research and development laboratory with associated maintenance operations. The property is located in an intensely operated agricultural area about 15 miles south of Yakima and about 6 miles west of Toppenish, WA. The climate is high desert with less than 15 inches precipitation per year. Agricultural water is piped from the Yakima River. Process water for facility operation is pumped from an onsite well and monitored to meet food grade water quality standards.

II. **CHRONOLOGY OF EVENTS** During the 1991 removal of a 15,000 gallon heating oil tank, soil contamination and bunker fuel floating on top of groundwater was found and removed and the site reported clean by White Shield Inc. in August 1991. About 870 cubic yards of contaminated soil removed from the extensive excavation was then land-farmed on site. EPA concern over potential groundwater contamination was addressed when additional groundwater sampling in July 1995 by Environmental Associates indicated no contamination. Land farming treatment of the removed soil by the owner from 1991 through 2002 addressed the petroleum contamination and samples of surface and subsurface land-farmed contaminated soil evaluated by White Shield, Inc (Feb, 2002) demonstrate no significant contamination.

III. **REVIEW OF RELEASE INFORMATION**

June 1991 to present Correspondence, and notes in files

1. August 23, 1991 Site Assessment Report for Underground Storage Tank Closure (White Shield Inc.)
2. November 1993 Level I Environmental Property Assessment (JUB Engineers)
3. June 1, 1995 Updated Phase 1 Environmental Audit (Environmental Associates)
4. July 18, 1995 Supplemental Environmental Study (Environmental Associates)
5. February 8, 2002 Final Cleanup Report for UST Closure (White Shield, Inc)

IV. **DISCUSSION**

The bunker oil contamination was removed at the source and subsequent soil and groundwater sampling at the pit confirms no contamination at the source. Groundwater monitoring well which are useful in determining water soluble contamination would be ineffective in trying to locate these pockets if they even exist. A 1992 hydro geology analysis indicates 2.mgd flow of groundwater flow per day through the site during the irrigation season. This number seems high but in general the groundwater flow through the lower Yakima Valley is generally recognized as high volume and rapid. Groundwater level at the sampling period was 12 bgs, but the area is known to have wide fluctuations due to effects of massive irrigation.

V. CONCLUSION

All accessible petroleum contaminated soil associated with the UST has been excavated and land farmed. There are no drinking water wells within half a mile down gradient and a quarter mile upgradient of the site. The 20 acre intense industrial site is covered by pavement and buildings. The groundwater flow is so rapid and of such volume there is little likelihood of any pockets remaining. There is ongoing institutional control over access to the property. There are no vulnerable human populations that could contact the contamination. There are no threatened or endangered species habitat within miles of the site. The environmental risk is low and therefore does not justify further consideration of this property at this time. I recommend closure of this site with qualification statements that it can be reopened if new information becomes available.

Recommended:

Mike Shepherd
LUST Site Manager

Date

Concur:

Wally Moon
Indian Lands Team Lead

Date

Approved:

Tim Hamlin
UST Program Manager

Date